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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

DOMINIQUE HUETT, an individual,

Plaintiff,

v.

THE WEINSTEIN COMPANY LLC,  
BOB WEINSTEIN and HARVEY  
WEINSTEIN,

Defendants.

CASE NO.: 2:18-cv-6012 SVW (MRW)  
Honorable Stephen V. Wilson

**DECLARATION OF CYNTHIA L.  
ZEDALIS, ESQ. IN SUPPORT OF  
DEFENDANT HARVEY  
WEINSTEIN'S MOTION TO STAY**

Hearing Date: January 28, 2019  
Time: 1:30 p.m.  
Courtroom: 10A

I, CYNTHIA L. ZEDALIS, ESQ., declare as follows:

1. I am an attorney-at-law licensed to practice before this Court and am counsel for Defendant Harvey Weinstein ("Defendant") in this action. I have personal and first-hand knowledge of the facts set forth below, and if called and sworn as a witness, I could and would competently testify as to each of them.

2. I submit this Declaration in support of Defendant's Motion to Stay. The grounds for granting the instant motion are more fully set forth in the

1 accompanying memorandum of law and the Declaration of Benjamin Brafman, Esq.  
2 (“Brafman Dec.”), criminal counsel for Defendant.

3       3.     A stay of this action is necessary to safeguard his liberty interests and  
4 constitutional right against self-incrimination. As set forth in the Brafman Dec.,  
5 Defendant is currently under indictment for charges arising out of allegations of  
6 sexual assault and sexual misconduct that parallel the allegations made by Plaintiff  
7 in this matter. I have been informed by Mr. Brafman that Defendant cannot respond  
8 to the allegations in the Amended Complaint, participate in the discovery process, or  
9 otherwise defend himself in this action without asserting his Fifth Amendment rights  
10 or risk prejudicing his defense of the criminal charges against him.

11       4.     Attached hereto as Exhibit 1 is the California Superior Court’s decision  
12 in *Judy Huth v. William Henry Cosby, Jr.*, BC565560 (Cal. Sup. Ct. Mar. 30, 2016).

13       I declare under the laws of the United States of America that the foregoing is  
14 true and correct.

15       Executed on this 28<sup>th</sup> day of November, 2018, at Los Angeles, California.

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17   
18 CYNTHIA L. ZEDALIS, ESQ.